

HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LONE STAR TARGETED
ADVERTISING, LLC,

Plaintiff,

vs.

RHYTHMONE, LLC,

Defendant.

Case No. 2:19-cv-01474-JLR

**DEFENDANT RHYTHMONE, LLC'S
STIPULATED MOTION AND
~~(PROPOSED)~~ ORDER TO EXTEND
TIME TO ANSWER COMPLAINT OR
OTHERWISE RESPOND**

NOTE ON MOTION CALENDAR:

NOVEMBER 1, 2019

Defendant RhythmOne, LLC, through its undersigned counsel, hereby moves pursuant to Fed. R. Civ. P. 6(b) for an extension of time of up to thirty (30) days, to and including November 21, 2019, within which to answer Plaintiff's Complaint or otherwise respond. This is Defendant's first request for an extension of time. As more fully set out below, good cause exists for the extension of time sought in this Motion. Defendant's counsel contacted counsel for Plaintiff Lone Star Targeted Advertising, LLC, who indicated that Lone Star Advertising, LLC does not oppose this motion.

RhythmOne, LLC respectfully submits that good cause exists for the extension for the following reasons:

1. Defendant's counsel filed its appearance on October 18, 2019.

RHYTHMONE LLC'S STIPULATED MOTION TO
EXTEND TIME TO ANSWER COMPLAINT OR
OTHERWISE RESPOND- 1

CASE NO. 2:19-CV-01474-JLR

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2. This is a patent infringement case involving complex technical and legal issues, which require careful review and consideration.

3. An extension of time to file the Answer through November 21, 2019, will not substantially delay the case.

For the foregoing reasons, RhythmOne, LLC respectfully requests an extension of time to Answer Plaintiff's Complaint or otherwise respond.

Stipulated and Agreed this 22nd day of October, 2019.

BANIE & ISHIMOTO LLP

BERESFORD BOOTH PLLC

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RHYTHMONE LLC'S STIPULATED MOTION TO
EXTEND TIME TO ANSWER COMPLAINT OR
OTHERWISE RESPOND- 2

CASE NO. 2:19-CV-01474-JLR

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~~PROPOSED~~ ORDER

Based on the Stipulation of the Parties, IT IS HEREBY ORDERED that;

The deadline for Defendant RhythmOne, LLC to Answer the Plaintiff's Complaint has been extended to November 21, 2019.

DONE IN OPEN COURT this ²⁰23 day of October, 2019.


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RHYTHMONE LLC'S STIPULATED MOTION TO
EXTEND TIME TO ANSWER COMPLAINT OR
OTHERWISE RESPOND- 3

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